



立法會 CB(2) 1127/03-04(03)號文件
LC Paper No. CB(2) 1127/03-04(03)

Date: 26/1/2004

Mrs. Constnace Li
Clerk to Panel
Legislative Council Secretariat
3/F, Citibank Tower,
3 Garden Road
Hong Kong

Dear Sir or Madam:

Subject: Comments on Nutrition Labeling Scheme

The Hong Kong Nutrition Association (HKNA) would like to comment on the Consultation Paper on Labeling Scheme on Nutrition Information, issue on November 2003.

The HKNA fully agrees to launch and support the introduction of a nutritional labeling scheme in Hong Kong, as we believe that a well-designed nutritional labeling scheme can bring benefits and conveniences including but not limited to the followings:

1. Making accurate and evidence-based health information more available to interested publics, in order words, prevent printing of misleading nutrition information/claims that may cause harm to the general public;
2. Increase the practicality of therapeutic diets;
3. Help to promote healthy eating;
4. Aid in effective and accurate product-to-product comparisons, and therefore allow healthier food choices being made;
5. Act as a form of nutrition education for the general public;
6. Facilitate and encourage the manufacturing of healthier food products.

Here are specific comments and suggestions for various parts of the paper:

- 1) Overall proposal
 - a) HKNA agrees to implement a mandatory nutrition labeling system for prepackaged food products, with a set of local Nutrient Reference Values (NRV) and a set of tolerance limits of the nutrient verification.

2) Labeling Requirement

- a) HKNA agrees on the **Coverage** of the labeling requirements specified in section 6.4 to 6.6.
- b) HKNA agrees on the **Rationale** of the labeling requirement specified in section 6.7 to 6.8. *However, the term “foods for special dietary uses”, specified in section 6.9, needs to be further clarified to prevent foods with false and misleading names to be included under this category. For example, a bar of chocolate with artificial sweetener might label itself as “suitable for diabetes” and may be classified as foods for special dietary uses. However, it can still lead to increased risk of obesity if consumed excessively. There needs to be regulations installed to prevent any abuse of this exempted category.*

3) Core Nutrients

- a) HKNA agrees on the rationale and nutrients to be included in the core nutrient list, specified in section 6.10 to 6.20. The core nutrient list will contain energy, protein, carbohydrate, fat, saturated fat, cholesterol, fiber, calcium, sodium and sugars.

4) Other Nutrients

- a) HKNA agrees on the allowance of the listing of vitamins and minerals with NRV established on a voluntary basis, stated in section 6.21 and 6.22.

5) Nutrient for which a claim is made

- a) The HKNA agrees on the nutrient claim requirements stated in section 6.23 and the rationale in 6.24.

6) Nutrient Content Expression

- a) The HKNA agrees on the requirements stated in section 6.25 and 6.26.

7) Presentation of Nutrient Content

- a) The HKNA agrees that all food products carrying nutrient-related claims should provide nutrition labeling during Phase I.

8) Nutrient Content Claim

- a) The HKNA agrees that only nutrients mentioned in section 6.30 can make nutrient content claims, and which a set of local NRVs shall be established.
- b) *When developing the local NRVs, the HKNA suggests to get that the government shall sought views from different nutritional professionals including professional nutrition societies and universities.*
- c) *The HKNA supports using the dietary reference intake from China as a reference, in view of the fact that*
 - i) *Chinese remains as the major population in Hong Kong;*

ii) Health professionals, and

iii) Food manufacturers

in order to enhance the effectiveness of a nutritional labeling system.

14) Clarification of The Exemption List

- a) The HKNA suggests to have a more specific exemption list for the labeling scheme;*
- b) The following items need to be clarified for their eligibility for exemptions:*
 - i) Preserved meats such as Cantonese sausage (臘腸) and Cantonese preserved meats “臘肉”, and etc.*
 - ii) Tea including Asian and Western teas.*
 - iii) Traditional foods consumed during Chinese festivals such as mook-cake, New Year cake, Chinese Tamale (糰), and etc.*
 - iv) Single packaged bake goods sold in bakery shop.*
- c) Infant Formulas and Special Dietary Foods*
 - i) The HKNA suggests fully adapting the regulating criteria from the World Health Organization.*

Thank you very much for your kind attention. Shall there be more views sought from the HKNA, please contact us at info@hkna.org.hk.

Best regards,



June Chan
President
Hong Kong Nutrition Association



Fax

To: Ms. Constance Li 2509 0775

From: Ms. June Chan 2849 2604

President

Hong Kong Nutrition Association Ltd.

Dear Ms. Li,

Please find the attached written reply on the Food Labelling Scheme Consultation Paper. Please feel free to contact me again if further information is needed.

Thank you very much for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'June Chan'. The signature is fluid and cursive, with a large loop at the beginning and a vertical line at the end.

June Chan

President (2003-2004)

Hong Kong Nutrition Association Ltd.